

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

**PENNSYLVANIA MANUFACTURERS)
INDEMNITY COMPANY,)**

Plaintiff,)

VS.)

CIVIL ACTION NO:

**PETE MORRIS MCCULLOUGH, III;)
SHELIA HALE, the mother and)
personal representative of Shawn Bone,)
deceased, J.D.G., a minor dependent of)
Shawn Bone, deceased, by and through)
SHELIA HALE, his grandmother and)
next friend; TAQUELLA N. GAINES,)
individually, and J.D.G. a minor, by and)
through his natural mother and next)
friend, TAQUELLA N. GAINES,)**

5:21-cv-01050-LCB

Defendants.)

**UNOPPOSED RENEWED MOTION FOR DEFAULT JUDGMENT AND JOINT
MOTION FOR DISMISSAL OF REMAINING DEFENDANTS**

COMES NOW Plaintiff Pennsylvania Manufacturers Indemnity Company and renews its Motion for Default Judgment against Pete Morris McCullough (Doc. 18), which is hereby incorporated by reference. By and through their undersigned counsel, Defendants Shelia Hale, mother and personal representative of Shawn Bone, Taquella N. Gaines, individually, and J.D.G., a minor, by and through his natural mother and next friends, Taquella N. Gaines and Shelia Hale, confirm that they do not contest the entry of this default judgment against McCullough.

Plaintiff Pennsylvania Manufacturers Indemnity Company and Defendants Shelia Hale, and Taquella N. Gaines, individually, and J.D.G., a minor by and through Taquella N. Gaines, pursuant to Fed. R. Civ. P. 41, stipulate that all Defendants, other than Pete Morris McCullough who has not appeared, be voluntarily dismissed from this action, costs taxed as paid.

Accordingly, Plaintiff requests that the Court enter a default judgment in favor of Pennsylvania Manufacturers Indemnity Company and against Defendant Pete Morris McCullough and dismiss all remaining Defendants.

/s/Connie Ray Stockham
Connie Ray Stockham (ASB-6238-K69C)
Hannah Mebane Thrasher (ASB-4334-H58M)
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/s/ Richard Riley
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and through his grandmother and next friend, Shelia
Hale

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/s/ Douglas J. Fees

Douglas J. Fees

Attorney for Taquella N, Gaines, individually,

And J.D.G., a minor, by and through his natural
mother and next friend Taquella N. Gaines

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